

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

FRANK DOMINIC DUNDEE,)	CASE NO. 1:19 CV 01141
)	
Plaintiff,)	JUDGE DAN AARON POLSTER
)	
v.)	MAGISTRATE JUDGE JONATHAN D.
)	GREENBERG
UNIVERSITY HOSPITALS)	
CORPORATION, et al.,)	
)	DEFENDANT’S MOTION FOR LEAVE
Defendants.)	TO EXCEED PAGE LIMIT
)	

NOW COMES Defendant University Hospitals Health Systems, Inc. (“University Hospitals”), by and through undersigned counsel, and hereby moves this Honorable Court for leave to exceed the page limit for its Motion for Summary Judgment set forth in L.R. 7.1(f). Additional pages are needed in order to provide a thorough response to Plaintiff’s claims. In particular, a complete discussion of Plaintiff’s lengthy employment history is necessary to counter Plaintiff’s claim that temporal proximity establishes causation. In the interests of justice, therefore, University Hospitals respectfully requests that it be granted leave to file a Motion for Summary Judgment of up to 30 pages in length.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on May 11, 2020, a true and correct copy of this *Motion for Leave to Exceed*

Page Limitation was served via Electronic Mail upon the following Parties:

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